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VIA ECF

The Honorable J. Paul Oetken
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

**Re: *Berger v. New York University*,
Case No. 19-cv-267 (JPO) (S.D.N.Y.)**

Dear Judge Oetken:

This firm represents defendant New York University in the above-referenced action.

We write to request a brief extension of time for defendant to submit its opposition to plaintiff's pending Motion to Remand (ECF No. 12, 13), filed on February 7, 2019. Defendant's response to plaintiff's motion currently is due February 21, 2019. We respectfully request a two-week extension of time to respond, such that defendant's opposition is due on or before March 7, 2019. Counsel for plaintiff Richard Berger has consented to the requested extension.

This is the first such request for an extension of time, and the proposed extension shall not affect any other deadlines in the matter.

We thank Your Honor for his attention to this matter and are available at the Court's convenience should Your Honor have any questions or concerns regarding the requested extension of time.

Respectfully submitted,



Joseph A. Piesco, Esq.

cc: James E. Murphy (counsel for plaintiff)